

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re: Methyl Tertiary Butyl Ether Products (“MTBE”)  
Liability Litigation

Master File No. 1:00 – 1898  
MDL 1358 (SAS)

**This document applies to: All Cases**

**WITHDRAWAL OF APPEARANCE**

Crowell & Moring LLP, counsel for defendants Shell Oil Company, Shell Oil Products Company LLC, Deer Park Refining LP, Motiva Enterprises LLC, Equilon Enterprises LLC (d/b/a Shell Oil Products US), Shell Trading US Company, TMR Company, and Pennzoil-Quaker State Company (the “Shell Defendants”), hereby informs the Court that Susan V. Watson will no longer be associated with the firm and requests that the Court withdraw the appearance of Ms. Watson as counsel pro hac vice in these actions. The Shell Defendants will continue to be represented by counsel Rick Wallace, Pete Condrón, and Ruben Reyna of Crowell & Moring.

Dated: May 16, 2019

Respectfully submitted,

/s/ Richard E. Wallace  
Richard E. Wallace, Jr.  
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*Attorneys for the Shell Defendants*

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**[PROPOSED] ORDER APPROVING WITHDRAWAL OF APPEARANCE**

The Withdrawal of Appearance of Susan V. Watson as counsel of record for defendants Shell Oil Company, Shell Oil Products Company LLC, Deer Park Refining LP, Motiva Enterprises LLC, Equilon Enterprises LLC (d/b/a Shell Oil Products US), Shell Trading US Company, TMR Company, and Pennzoil-Quaker State Company (the “Shell Defendants”) under Local Civil Rule 1.4 is hereby GRANTED.

SO ORDERED,

Dated: \_\_\_\_\_, 2017

\_\_\_\_\_  
HON. VERNON S. BRODERICK

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of May, 2019, the foregoing Withdrawal of Appearance of Susan V. Watson was served on all counsel of record by File & ServeXpress.

/s/ *Keith A. Kaider*

Keith A. Kaider